

As an overall feedback for the new Guidelines for Article 23 of EDPB, my personal input, is that the guidelines are very general and there are no specific guidelines that can help controllers and processors. Again very general definitions that cannot help the awareness and comprehensiveness of a very obscure and harsh Regulation as GDPR.

It is needed more specific guideline for the proportionality test, e.g. HOW CAN WE DO IT how States or Authorities can do it, the step by step guidance for a proper check and test. There shall be more specific guideline about, what is the exact meaning of the definition of public interest / health etc.

In order to protect Privacy and Personal Data there shall be very specific bargains and orientation. Or else there will be arbitrary outcomes and decisions.